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6 Attorneys for Defendant
JASON EDWARD THOMAS CARDIFF

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

JASON EDWARD THOMAS CARDIFF,

Defendant.

Case No. 5:23-cr-00021-JGB

JASON CARDIFF'S *EX PARTE* APPLICATION TO REMOVE CURFEW ORDERED AS A CONDITION OF PRETRIAL RELEASE

*[Filed concurrently with Declaration of
Stephen G. Larson and [Proposed]
Order]*

EX PARTE APPLICATION

By and through counsel of record, Jason Cardiff hereby seeks relief from the curfew imposed as a condition of pretrial release. Should the Court decline to permanently lift his curfew, Mr. Cardiff seeks relief from the curfew for the evening of May 11, 2024, so that he may attend a wedding within a few miles of his current residence.

8 On November 30, 2023, Mr. Cardiff was ordered released on a \$530,000
9 appearance bond, justified in the amount of \$500,000 with full deeding of real
10 property. His release conditions include, among other conditions: a travel restriction
11 to the Central District of California and the Southern District of Texas; a curfew
12 between the hours of 8:00 p.m. and 8:00 a.m.; and, placement in the custody of
13 third-party custodian, Attorney Stephen Cochell. Lilia Murphy and Brian Kennedy
14 executed affidavits of sureties in support of the bond. Ms. Murphy also deeded her
15 home as collateral.

16 Mr. Cardiff is currently living with Attorney Cochell in the Kingwood, Texas,
17 and he is being supervised by United States Probation Officer Jack Sherrod of the
18 Southern District of Texas.

19 Probation Officer Sherrod advised that U.S. Probation does not oppose the
20 request to permanently remove the curfew condition from Mr. Cardiff's conditions
21 of pretrial release. In explaining his non-opposition, PO Sherrod advised that Mr.
22 Cardiff would still be on "standalone" location monitoring, which would allow U.S.
23 Probation to determine Mr. Cardiff's location at any given time.

24 Sureties Lilia Murphy and Brian Kennedy do not oppose Mr. Cardiff's
25 request to permanently lift Mr. Cardiff's curfew.

26 DOJ Attorney Sebastian Manu advised the undersigned that the government
27 opposes Mr. Cardiff's request to permanently remove the curfew condition but does

1 not oppose Mr. Cardiff's request to lift the curfew on May 11, 2024, so that he may
2 attend a wedding.

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4 Dated: May 8, 2024

LARSON LLP

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By: /s/ Stephen G. Larson

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Stephen G. Larson

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Attorneys for Defendant

JASON EDWARD THOMAS CARDIFF

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